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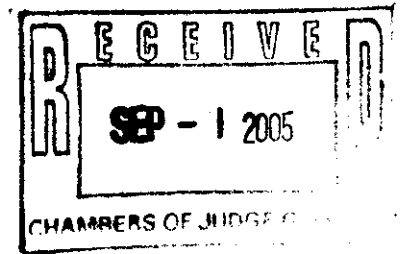
LAW OFFICES OF NEIL B. CHECKMAN

U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

★ SEPT 14 2005 ★

BROOKLYN OFFICE

August 29, 2005



Hon. John Gleeson  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
**Please file under seal**

*The probation officer  
supervising Ms. Leary is directed to  
advise the Court on this  
Application.*

**Re: United States v. Jennifer Leary,  
03 Cr. 1207 (JG)**

*Is released*  
s/John Gleeson *U.S.D.J.*

Dear Judge Gleeson:

*9-2-05*

I am the attorney who was previously assigned to represent Jennifer Leary on the above-referenced information. Ms. Leary was sentenced before this Court on May 7, 2004.

I write to request that the Court consider granting the defendant an early termination of her term of Probation pursuant to 18 U.S.C. §3564(c). Ms. Leary, who cooperated with the Government during the pendency of her case before this Court, has paid all required fines and assessments and has been in full compliance with the terms of her supervision.

As the Court will recall, at the time of Ms. Leary's sentence, the undersigned informed the sentencing court that Ms. Leary would be living with her fiancé, Mr. Joseph Robertson, Jr. and running the family-owned restaurant that he inherited. To date the couple has been engaged in running that restaurant. Recently, Mr. Robertson and others have opened a restaurant in Pavones, Costa Rica where the couple hopes to reside after Ms. Leary finishes her Probation.

Mr. Robertson has been traveling back and forth, but wishes to close their present restaurant and to run the Pavones restaurant on a full-time basis. It is anticipated that Jennifer would be running it with him. Those plans will, by necessity, need to be postponed, unless the Court grants the instant application. It is an expensive commute for Mr. Robertson to travel back and forth to Costa Rica, and it has become apparent that the present arrangement will place the couple's ability to keep the restaurant running properly in great jeopardy. Even if the supervising probation officer were to allow Ms. Leary to make trips to Costa Rica with Mr. Robertson, it

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would still not enable her to become involved in the restaurant's operation in a meaningful way.

Ms. Leary has informed me that the couple have several friends who are permanently living in the Pavones area and raising their families. Ms. Leary wants to be able to join them and move on with her life.

Accordingly, counsel requests that this Court consider granting our application for the early termination of Jennifer Leary's probation supervision so that she can be able to join her fiancé in Costa Rica and begin their future together.

On behalf of Ms. Leary, I thank the Court for considering this application.

Very truly yours,

A handwritten signature in black ink, reading "Neil B. Checkman". The signature is fluid and cursive, with the first name "Neil" being particularly prominent.

Neil B. Checkman

/NBC

cc: A.U.S.A. Jonathan E. Davis  
U.S.P.O. Tony Garoppolo  
U.S.P.O. Ricardo Ruiz  
Ms. Jennifer Leary